

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

MICHELLE TAYLOR,
Independent Administrator of the Estate
of Monty Dale Richards, Deceased

Plaintiff,

VS.

UNITED STATES OF AMERICA,

Defendant.

Case No. 15-cv-662-DRH-DGW

PETITION TO SETTLE WRONGFUL DEATH CLAIM AND DISTRIBUTE FUNDS

NOW COMES the Petitioner, MICHELLE TAYLOR, as Independent Administrator of the Estate of Monty Dale Richards, Deceased, by and through her attorney, Daniel C. Katzman, respectfully requests the Court to approve the settlement of the wrongful death claim involving Monty Dale Richards, deceased, and to distribute the proceeds of the settlement of the wrongful death claim and to approve attorneys' fees and expenses in connection with the prosecution of the wrongful death claim on behalf of MICHELLE TAYLOR, as Independent Administrator of the Estate of Monty Richards, Deceased, against the Defendant, UNITED STATES OF AMERICA, and in support of her Petition states as follows:

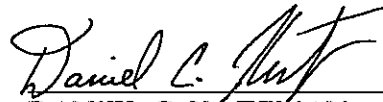
1. That Petitioner is the duly appointed Administrator of the Estate of Monty Dale Richards, Deceased.
2. That Monty Dale Richards died on February 26, 2013.
3. That Petitioner, Michelle Taylor, as Independent Administrator of the Estate of Monty Dale Richards, Deceased, has a cause of action arising out of the alleged wrongful death of Monty Dale Richards and has filed a lawsuit against the United States of America.
4. The only lien against the proceeds of the settlement is from Medicare.

5. That the Defendant, United States of America, has offered to settle the aforementioned wrongful death claim.

6. That the beneficiaries of the Estate of Monty Dale Richards, Deceased, are of legal age and under no legal disability.

WHEREFORE, Petitioner prays that this Court grant the following relief:

1. Approve the settlement offer made on behalf of the Defendant, United States of America.
2. Approve attorneys' fees and expenses pursuant to the contingent contract between the Administrator and her attorneys and to allow the distribution of these monies to Plaintiff's Attorneys, and the net proceeds to the beneficiaries of the wrongful death claim.
3. To grant permission for Michelle Taylor, as Independent Administrator of the Estate of Monty Dale Richards, Deceased, to sign the appropriate settlement documents and releases.



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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has caused a true and correct copy of Plaintiff's Petition to Settle Wrongful Death Claim and Distribute Funds to be served upon the following attorney(s) of record in the above-entitled matter:

Mr. Adam Hanna
Mr. Nicolas Biersbach
Assistant United States Attorneys
Nine Executive Drive
Fairview Heights, Illinois 62208

via email on the 9th day of August, 2016.

